

Exhibit B

DEPARTMENT OF HOMELAND SECURITY  
U.S. Immigration and Customs Enforcement

**NOTICE OF INTENT TO FINE PURSUANT TO SECTION 274A  
OF THE IMMIGRATION AND NATIONALITY ACT**

United States of America

Office Address 601 West 26th Street, Suite 700New York, NY 10001File Number NY19NR18NY0045

In the matter of (Respondent):

GARDEN MINI DELI INC.

Address (Street Number and Name, City, State, and Zip Code)

163 Garden Street  
Poughkeepsie, New York 12601

Upon inquiry conducted by U.S. Immigration and Customs Enforcement (ICE), it is alleged that:

See Attached Documents

Upon the basis of the foregoing allegations, it is charged that you are in violation of the following provisions(s) of law:

See Attached Documents

Wherefore, pursuant to Section 274A of the Immigration and Nationality Act and Part 274a, Title 8, Code of Federal Regulations, it is the intention of ICE to order you to pay a fine in the amount of \$19,865.45.

Signature of Chief Counsel or Designee	
MICHAEL R HOROWITZ      Digitally signed by MICHAEL R HOROWITZ Date: 2020.06.18 10:08:10 -04'00'	
Name of Chief Counsel or Designee	
Michael Horowitz	
Title of Chief Counsel or Designee	
Senior Attorney	
Date	
06/18/2020	

Signature of Issuing Officer	
EDWARD V OWENS      Digitally signed by EDWARD V OWENS Date: 2020.06.29 23:10:25 -04'00'	
Name of Issuing Officer	
Peter C. Fitzhugh	
Title of Issuing Officer	
Special Agent in Charge, New York	
Date	
6/29/2020	

I. You have the right to contest this Notice. If you desire to contest this Notice, you must:

1. Submit a written request for a hearing before an administrative law judge within 30 days from the service of this Notice. The hearing will be conducted pursuant to Title 5, United States Code, Sections 554 - 557.

2. Submit the written request for a hearing either in person or by certified mail to the following address:

Sandra Osmanovic  
U.S. Department of Homeland Security  
U.S. Immigration and Customs Enforcement  
26 Federal Plaza, Room 1130  
New York, NY 10278

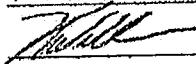
II. You may submit to ICE a written answer responding to each allegation listed in this Notice either in person or by certified mail, at the above address.

III. If a written request for a hearing is not received on a timely basis, ICE will issue a final and unappealable order in 45 days directing you to pay a fine in the amount specified in this Notice. If the charge specifies violation(s) of subsection 274A(a)(1)(A) or subsection 274A(a)(2) of the Immigration and Nationality Act, the order will also require that you cease and desist from such violation(s).

IV. You have a right to representation by counsel of your choice at no expense to the U.S. Government.

V. Small entities may direct comments about regulatory and/or enforcement actions to the Small Business Administration's (SBA) Office of the National Ombudsman via the Internet ([www.sba.gov/ombudsman](http://www.sba.gov/ombudsman)); email ([Ombudsman@sba.gov](mailto:Ombudsman@sba.gov)); telephone (1-888-REG-FAIR); or mail (SBA Office of the National Ombudsman, 409 Third St., SW, Washington, DC 20416). The National Ombudsman process has no effect on your rights or obligations under the procedures of the agency on which you are commenting. You must still comply with all of that agency's processes and procedures.

VI. Any statement given may be used against you in these proceedings.

Certificate of Service	
Served by (print name)	<u>Keridon Williams</u>
Date served	<u>July 9, 2020</u>
Method of service	<u>Certified Mail</u>
Person or entity served	<u>Adam Paskoff</u>
Place of service	<u>Paskoff + Tambor LLP</u>
Signature of employee or officer	
Name and title of employee or officer	<u>Keridon Williams, Special Agent</u>

**COUNT I**  
**FAILED TO PREPARE AND/OR PRESENT THE EMPLOYMENT ELIGIBILITY**  
**VERIFICATION FORM (FORM I-9)**

A. The Respondent hired the following individuals for employment in the United States:

1. Aleem	Ahmed	SSN XXX-XX-5078
2. Nargis	Ahmed	SSN XXX-XX-3884
3. Rafiq	Ahmed	SSN XXX-XX-3265
4. Sameer	Dawood	SSN XXX-XX-2199
5. Darlene	Denike	SSN XXX-XX-7914
6. Linda	Joinville	SSN XXX-XX-8834
7. Murtuza	Mir	SSN XXX-XX-7719
8. Muhammed	Mustfa	SSN XXX-XX-0397
9. Gurdeep	Singh	SSN XXX-XX-5951
10. Jagpal	Singh	SSN XXX-XX-6457
11. Joginder	Singh	SSN XXX-XX-8341

B. The Respondent hired the individuals listed in paragraph A after November 6, 1986; and

C. The Respondent failed to prepare and/or present the Employment Eligibility Verification Form (Form I-9) for the individuals listed in paragraph A after being requested to do so by an authorized agency of the United States.

**WHEREFORE**, it is charged that the Respondent is in violation of § 274A(a)(1)(B) of the Immigration and Nationality Act, 8 U.S.C. § 1324a(a)(1)(B), which renders it unlawful, after November 6, 1986, for a person or entity to hire, for employment in the United States, an individual without complying with the requirements of § 274A(b) of the Immigration and Nationality Act, 8 U.S.C. § 1324a(b).

The penalty for this Count is a civil money penalty of **\$1,805.95** for each violation relating to the individuals listed in paragraph A.

The total penalty for this Count is a civil money penalty of **\$19,865.45**.